

I am submitting comment on two issues: Interoperability and Speed of Answer requirements for VRS.

First, I do not think that VRS providers should not have an interoperability requirement. Some providers have used the recent instant messaging ruling as a way of backing up their argument for interoperability. What they have overlooked is that America Online has a monthly fee for their customers. AOL does not use instant messaging as their source of revenue, it is a value added service. In contrast, for VRS service providers, their only service is providing interpretation. The value added parts come in with features develop by those providers. Those features make some providers more attractive than others. If interoperability were mandated, there would be no incentive to develop those value added features or to provide competitive enhancements of the service. Letting other companies take advantage of the millions of dollars of research and development of one company would make it so that research and development would be stifled - because there is no monthly fee as is the case of IM - there is only the interpreting service. This would be like asking AOL to allow all other internet providers to use their operating software - not just be allowed to hook in to their IM.

The second issue is with a required speed of answer requirement. I think that the FCC should not take a short sighted view of this, but rather look at what will be required to provide VRS to all the consumers in the country who would prefer to use VRS over TRS. VRS is much closer to the functionally equivalent standard than TRS. However, the skill required to provide VRS is much higher. Some providers have mentioned that several years ago, there where not enough people to provide TRS at a minimum of 60 words per minute, however, that has changed. What they fail to mention is that most people can be taught to type quickly in as short a period as 2 months. However, to become a qualified interpreter takes at between 5-7 years. Then an additional 5 years of experience should be gained before attempting the highly specialized setting of VRS. That gives a lag time of at least 10 years before we will see significantly more qualified interpreters for VRS work. I was the coordinator for a Sign Language Interpreting Program, have been a teacher in that specialty for more than 6 years, and have been certified interpreter for more than a decade.

The real focus of the FCC should be to provide VRS to as many ASL users as possible. While there are no accurate records for people who use ASL in the United States, the general assumption of most organizations is that roughly 10% of the population suffers from a significant hearing loss. If we assume that of those only 20% percent use American Sign Language, that is still a population of 5,300,000 ASL users (these are conservative estimates). If each of them uses VRS for only 1 hour during a week, that is over 176,666 man hours/week (given an efficiency of 50% which is actually higher than what most providers recommend). If an interpreter works 8 hour shifts 4 days a week, that requires more than 5,520 interpreters/week. Given the current number of certified interpreters in the country, it is unreasonable to expect that all of them live with in commuting distance to a VRS center, that all of them are actively involved in the interpreting profession or

that they would all drop what they were doing to come work for a VRS center when they were needed. The fact is, there are not enough interpreters. There weren't enough interpreters to serve the communities need before VRS. The shortage has been well documented. Now that VRS is here, there are even fewer interpreters.

If the FCC takes a short sighted view, the end result will be Deaf people wanting to have access to VRS but being denied not because the provider isn't able to provide the service, but because of a provider's necessity to meet a speed of answer requirement.